

GENERAL COMMENTS:

The Ecology SOPs are generally adequate except for SOP 5.13 on the development of field sampling plans (FSP). The inadequacies primarily result from inconsistent statements between the SOP for FSP development and the contents of the Environmental Evaluation work plans reviewed for Operable Units 1, 2, 5, and 6. It appears that some issues may not be covered by either document. Our specific comments elaborate on this issue.

There is still no indication of how field personnel will be alerted to the possible existence of threatened, endangered, or other special status species on Rocky Flats, the protocols which will be implemented if any of these species are encountered, and the limitations on field activities which will be required to avoid harming them. In response to our original comment on this issue, DOE refers to the selection criteria for key receptor species and the community survey procedures in the Ecology SOPs. This response is not considered to be adequate. The referenced criteria does not describe field procedures and the community survey procedures make no mention of special status species. The revised Ecology SOPs must contain a current list of threatened, endangered, and candidate species which might be encountered at Rocky Flats and also must explicitly state that the Colorado State Office of the U.S. Fish and Wildlife Service must be contacted immediately if a threatened or endangered species is encountered.

SPECIFIC COMMENTS:

1. SOP 5.2, Sampling of Benthic Macroinvertebrates: The response to our original comment on the use of the Hess stream sampler is considered to be inadequate. The advantages and limitations of both the Surber and the Hess samplers should be clearly stated in the text of the SOP.
2. SOP 5.4, Sampling of Fishes: Our original comment required that if a water displacement method is used for weighing fish, it should be described. The revised SOP allows for the use of both scales and the water displacement method but still contains no description of the latter.
3. SOP 5.6, Small Mammals: The revised SOP has not addressed our original comment. The sampling grid as described will cover an area of 45 meters by 45 meters not 2500 square meters as indicated in the text. Our original comment remains.
4. SOP 5.7, Sampling of Birds: The text was not revised to address confusion resulting from the list of bullets. Therefore, the original comment remains.

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5. SOP 5.13, Field Sampling Plans:

a. Pages 7 and 8: The bullets list items which the FSP should specifically identify. These include sampling locations, sampling intensity (sample frequency and sample size), and quality assurance and quality control. These topics have not been included in the FSPs prepared thus far other than for aquatic systems. Habitat types, numbers of samples to be collected in each habitat type, and sample locations should be provided in the FSPs in accordance with the SOP.

b. The discussion on QA/QC is based on sample collections designed more for water and soil samples than ecological samples. The SOPs should discuss QA/QC methods to verify biological data and calculations to be used to derive numerical values that will appear in the remedial investigation report.

c. The OU specific workplans state that SOPs are being developed for soil microbes, recording and managing data, preserving and handling samples, conducting laboratory studies, and incorporating QA/QC. The revised SOPs include none of these.

6. Appendix A, Species Code List: The species code list is limited to vertebrate species expected to be encountered at RFP. The reason for limiting the list to vertebrates is not clear because of the plans to study benthic macroinvertebrates, terrestrial invertebrates, periphyton, plankton, and vegetation. All of the data collected during the environmental evaluations should be on the same database.